

*****CONFIDENTIAL DEPOSITION*****

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Leighton Technologies, LLC,)

Plaintiff-Counterclaim)

Defendant,)Case No.

-vs-)04Civ

Oberthur Card Systems, S.A.,)2496(CM)

Defendant-Counterclaim)

Plaintiff.)

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Continued deposition of KEITH R.

LEIGHTON, a witness herein, called by the
Defendant- Counterclaim Plaintiff, as if
upon cross-examination under the statute,
and taken before Luanne Stone, a Notary
Public within and for the State of Ohio,
pursuant to the issuance of notice and
subpoena, and pursuant to the further
stipulations of counsel herein contained, on
Monday, the 10th day of October, 2005 at
9:00 o'clock A.M., at the Renaissance Hotel,
the City of Cleveland, the County of
Cuyahoga and the State of Ohio.

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Tackla
& Associates

Court Reporting & Videotaping

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1 Q: And you also -- and you also have to
2 run various tests on the pressure; is that
3 correct?

4 A: That's correct.

5 Q: So, you run some tests where the
6 pressure and the cooling is higher than the
7 pressure in the heating, correct?

8 A: Right.

9 Q: And you run some other tests where
10 the pressure in the cooling is lower than
11 the pressure in the heating, correct?

12 A: That's set up for failure when the
13 pressure is lower on the cooling. That's a
14 set-up for failure. I have to have a
15 starting point.

16 Q: Uh-huh.

17 A: With figures that I can calculate to
18 know where I'm at when I'm starting the
19 first test, and this is where I would start
20 at on a first test.

21 Q: You would start out on the first test
22 to maintain the same pressure in cooling
23 that you used in heating; is that correct?

24 A: I would try it, yes.

25 Q: Okay.

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1 A: And nine times out of ten, it's going
2 to be an increase in pressure, because as
3 soon as you have a drop in pressure, the
4 surface that you have on your plastic card
5 will not be uniform. You're -- you'll have
6 a glossy card, but it will look like it's
7 got water laying on the surface of it when
8 it's coming out of the laminator. It will
9 look like puddles in it, or what we call
10 lakes in the industry.

11 Q: And was that term used -- lakes, was
12 that used back in the 1980's?

13 A: Yes. As long as I've been in there,
14 as long as I've been making cards, trying to
15 figure out what causes them.

16 Q: And the way, as long as you were
17 making cards, is to get rid of the lakes is
18 to raise the pressure in the cooling?

19 A: I've found through my experience
20 that what causes these is a drop in
21 temperature during the cooling cycle.

22 Q: Uh-huh, and the cure to removing the
23 lakes is to raise the pressure during the
24 cooling cycle?

25 A: That's correct.

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1 Q: And that was something that you used
2 during the '80's?

3 A: Yes. I'm not sure whether this was
4 done at Arthur Blank, or whether this was
5 done at Plastag, but this is the test
6 that I've used, because not all plastic card
7 manufacturers have this 17-inch ram.

8 Q: You're referring to Exhibit 122 in
9 that last comment?

10 A: That -- that's correct, and it shows
11 to me that this is a single-stack laminator
12 because I'm dealing with one ram size here.

13 MR. JACOBS: Did you notice,
14 Mr. Gutkin?

15 MR. GUTKIN: I'm sorry.

16 MR. JACOBS: That's okay. Please pay
17 attention while I show you how I'm skipping
18 ahead.

19 MR. GUTKIN: Okay. He's telling me
20 he could use some cheesecake. Did you have
21 a question?

22 MR. JACOBS: No, I'm just skipping
23 ahead so far.

24 MR. GUTKIN: Okay.

25 BY MR. JACOBS:

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